

UNITED STATES DISTRICT COURT

for the

Southern District of TexasClerk, U.S. District Court
Southern District of Texas
FILED

OCT 8 2014

United States of America)

v.)

Case No. C-14-1068M

Nadeem JAFRI)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/7/2014 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C § 841(a)(1)

Did knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance in Schedule I of the Controlled Substance Act of 1970, to wit; 21.18 Kilograms of marijuana, approximate gross weight.

This criminal complaint is based on these facts:

See Attachment A

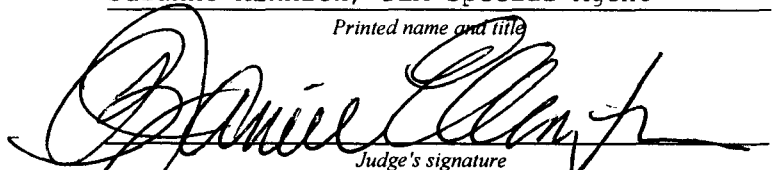
☒ Continued on the attached sheet.

Complainant's signature

Suzanne Minnick, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/8/2014

Judge's signature

City and state: Corpus Christi, TX

B. Janice Ellington, US Magistrate Judge

Printed name and title

JAFRI, Nadeem

Attachment A

On 10-06-2014, at approximately 8:45 pm, a purple Saturn approached the primary inspection lane for an immigration inspection of its occupants. As the vehicle approached the inspection area Border Patrol Agent (BPA) Howell noticed that the driver, subsequently identified as Nadeem JAFRI, hereinafter referred to as JAFRI, was gripping the steering so tightly that the whites of his knuckles were showing. As BPA Howell greeted JAFRI, BPA Howell observed that JAFRI had a large amount of sweat on his forehead, despite the fact that the air conditioning unit in the vehicle appeared to be on. BPA Howell asked JAFRI where he was headed, to which JAFRI mumbled an answer that BPA Howell could not understand. BPA Howell leaned in closer and repeated the question, to which JAFRI answered in a quiet voice, "Corpus." BPA Howell asked JAFRI what his purpose for traveling to Corpus was, to which JAFRI continued speaking in the same quiet voice stating he was going to see his dad who was in the hospital. During the interview, BPA Howell noticed that JAFRI continued to maintain his tight grip on the steering wheel and did not take his eyes off of BPA Howell. BPA Howell also observed JAFRI'S body posture appeared to be very rigid.

BPA Howell then looked in the back seat of the JAFRI'S vehicle and noticed that JAFRI did not appear to have any luggage, despite the fact that JAFRI was going on an overnight trip. At this point, BPA Howell became suspicious and asked JAFRI to tell BPA Howell again who he was going to see in Corpus Christi. JAFRI, this time, told BPA Howell that he was on his way to the hospital to see his daughter. The change in the JAFRI'S story further drew BPA Howell's suspicion. BPA Howell asked JAFRI if he had anything in the trunk to which JAFRI replied no, and shook his head. This added to BPA Howell's suspicion that JAFRI was possibly lying or hiding something, so BPA Howell asked for consent to check the trunk. JAFRI nodded his head, and said, "Yes," and handed BPA Howell the key to the vehicle. BPA Howell handed the key back to the JAFRI and directed JAFRI to park in the secondary inspection area.

An inspection of the trunk of the vehicle revealed cellophane bundles inside vacuumed sealed bags hidden in the spare tire area of the trunk and door panels of the vehicle operated by JAFRI. One of the bundles was cut open and revealed marijuana. A total of 25 bundles of marijuana, weighing 21.18 kilograms, approximate gross weight, were removed from the vehicle operated by JAFRI.

After rights advisement and waiver, JAFRI said he knew he was transporting illegal drugs and believed that he was transporting ten pounds of marijuana. JAFRI said he was to deliver the marijuana to Corpus Christi, TX.

The amount of marijuana, 21.18 kilograms, approximate gross weight, infers the intent to distribute.

AUSA Sam Brown authorized the prosecution of JAFRI.